

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

Larry Reed and Darnell McCoy,

Plaintiffs,

v.

General Motors LLC and OnStar, LLC,

Defendants.

Case No. 2:24-cv-10804

Hon. Jonathan J.C. Grey

Magistrate Judge Curtis Ivy, Jr.

Suzanne Block and Charles Justus, III,

Plaintiffs,

v.

General Motors LLC, OnStar, LLC, and
LexisNexis Risk Solutions Inc.,

Defendants.

Case No. 2:24-cv-10824

Hon. Jonathan J.C. Grey

Magistrate Judge Curtis Ivy, Jr.

**LEXISNEXIS RISK SOLUTIONS INC.'S RESPONSE TO
JOINT MOTION TO CONSOLIDATE AND JOINT MOTION FOR
APPOINTMENT OF CO-LEAD INTERIM CLASS COUNSEL AND
PLAINTIFFS' EXECUTIVE COMMITTEE**

STATEMENT OF ISSUES PRESENTED

1. Should the court consolidate the above-captioned putative class actions under Rule 42(a) of the Federal Rules of Civil Procedure and E.D. Mich. LR 42.1?

Defendant LexisNexis Risk Solutions Inc.'s answer: Defendant does not oppose consolidation but otherwise reserves all its rights and defenses to Plaintiffs' claims.

2. Should this Court defer ruling on Plaintiffs' Interim Class Counsel Motion because the parties have agreed that a stay of this litigation is appropriate given the pending proceedings before the Joint Panel on Multidistrict Litigation?

Defendant LexisNexis Risk Solutions Inc.'s answer: Yes.

Defendant LexisNexis Risk Solution Inc. (“LNRS”) respectfully submits this response to Plaintiffs Larry Reed, Darnell McCoy, Suzanne Block and Charles Justus, III (collectively, “Plaintiffs”) Joint Motion for Consolidation and Appointment of Co-Lead Interim Class Counsel and Plaintiffs’ Executive Committee. ECF Nos. 8-9.¹

LNRS adopts and incorporates the arguments set forth in Defendants General Motors, LLC and OnStar, LLC’s Response (“GM Defendants’ Response”) (ECF No. 16).

For the reasons explained in the GM Defendants’ Response, LNRS does not oppose Plaintiffs’ Joint Motion to Consolidate. However, LNRS reserves all rights and defenses to challenge Plaintiffs’ claims and intends to contest that the claims can be maintained as a class action.

With respect to Plaintiffs’ Interim Class Counsel Motion, for the reasons stated in GM Defendants’ Response, LNRS requests that any ruling on that motion be stayed pending an order from the JPML.

¹ LNRS is not a named defendant in *Reed, et al. v. General Motors LLC, et al.*, No. 2:24-cv-10804. However, Plaintiffs filed their Joint Motion to Consolidate in *Reed* (ECF No. 8) and a Notice of Joint Motion for Consolidation in *Block v. General Motors LLC, et al.*, No. 2:24-cv-10824 (ECF No. 9). Pursuant to E.D. Mich. LR 42.1, LNRS is filing its response in *Reed*, the earliest numbered case.

Respectfully submitted,

/s/ Matthew J. Lund

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Dated: April 18, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2024, I caused a copy of the foregoing Notice of Appearance and this Certificate of Service to be electronically filed with the U.S. District Court, Eastern District of Michigan, and notice will be sent by the Court's electronic filing system to all ECF participants.

/s/ Matthew J. Lund

MATTHEW J. LUND (P48632)